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Via ECF

Hon. Analisa Torres
U.S. District Court for the Southern District of New York
500 Pearl St., Rm. 15D
New York, NY 10007

Re: *Northfield Insurance Company v. NOA-LIOR, LLC, et al.*
Case No. 1:23-cv-00216-AT

Dear Judge Torres:

This office represents plaintiff Northfield Insurance Company ("Northfield") in connection with the above-referenced action. We submit this request, pursuant to section I.C. of the Court's Individual Practices in Civil Cases, for an extension of the deadline set forth in the Initial Pretrial Scheduling Order dated January 12, 2023 (Dkt. No. 16) to file a joint letter and proposed Case Management Plan and Scheduling Order.

Service was effectuated on the defendants as follows:

- NOA-LIOR, LLC via Secretary of State on January 18, 2023 (Dkt. No. 19);
- B.C.N. Management, LLC via Secretary of State on January 18, 2023 (Dkt. No. 23);
- BCN Development NY, LLC via Secretary of State on January 18, 2023 (Dkt. No. 22);
- Structureline Inc. via Secretary of State on January 18, 2023 (Dkt. No. 20);
- UA Builders Group via Secretary of State on January 18, 2023 (Dkt. No. 21); and
- Henry Alejandro Pinzon Cuellar via delivery to a person of suitable age and discretion and mail on January 27, 2023 (Dkt. No. 24).

To date, no appearance has been entered on behalf of any defendant.

Not a Partnership or Professional Corporation. All attorneys are employees of The Travelers Indemnity Company and its Property Casualty Affiliates.

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The current deadline to file a joint letter and proposed Case Management Plan and Scheduling Order is March 13, 2023. See Dkt. No. 16. Northfield respectfully requests a 30-day extension of this deadline in order to allow the defendants sufficient opportunity to appear in this action. Northfield intends to seek default judgment against any defendant that has not entered an appearance by the adjournment date. No prior request has been made for the relief sought herein.

Thank you for Your Honor's attention and consideration.

Respectfully submitted,



Lisa Szczepanski

GRANTED. By **April 12, 2023**, the parties shall file a joint letter and proposed case management plan.

SO ORDERED.

Dated: March 9, 2023
New York, New York



ANALISA TORRES
United States District Judge